

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA :

v. : CRIMINAL NO. 06-31-JJF

SALVADOR MARTINEZ-TORRES :

MOTION FOR EXTENSION OF TIME FOR FILING OF PRETRIAL MOTIONS

Defendant, Salvador Martinez-Torres by his undersigned counsel, Ubel G. Velez, Esquire, and pursuant to Fed.R.Crim.Pro. 45(b)(1)(A), hereby MOVES that this Honorable Court GRANT him an extension for the filing of pretrial motions, and avers the following in support thereof:

1. Defendant Salvador Martinez Torres is charged in this matter by Indictment filed on March 28, 2006 with the violation of the following statutes: 21 U.S.C. § 841 (a)(1) and (b)(1)(A) (conspiracy to distribute cocaine).
2. The indictment also charged Francisco Barrera-Lopez and Jose Luis Becerra Yepez.
3. Undersigned counsel was appointed to represent Defendant pursuant to the Criminal Justice Act, 18 U.S.C. § 3006e.
4. The court granted Defendant up to June 2, 2006 to file pre-trial motions.
5. Defendant had received a plea offer, which was revoked on June 1, 2006 since one if the defendants in this case intends to proceed to trial.
6. Given the extremely short period of time that has elapsed from the revocation of the plea offer, and the due date for filing of pretrial Motions, Defense Counsel requires additional

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time to prepare the case.

7. This is the first request for an Extension of Time in this matter, and Defense Counsel understands is the last one.

8. Counsel for the Government does not oppose this Motion.

9. Now that the plea offer is revoked, it is essential for the defense to determine the course of action to follow in this case before Pre-trial Motions are filed, and a reasonable period of time to file said motions is required.

Accordingly, defendant Salvador Martinez Torres respectfully requests that this Honorable Court EXTEND the time for the filing of Pretrial Motions in this matter, for a period of forty five (45) days.

Respectfully submitted,

s. Ubel G. Velez

Ubel G. Velez, Esquire
Attorney for Salvador Martinez-Torres

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ORDER

AND NOW, this _____ day of _____, 2006, in consideration of
Defendant Salvador Martinez-Torres' Motion for Extension of Time for filing of Pretrial Motions,
it is hereby ORDERED that said Motion is **GRANTED**, and Pretrial Motions in this matter must
now be filed on or before _____.

BY THE COURT:

HONORABLE JOSEPH J. FARNAN, JR.

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:

CERTIFICATE OF SERVICE

I, Ubel G. Velez, Esquire, do hereby certify that this 2nd day of June, 2006, I did serve true and correct copies of the within Motion for Extension of Time for Filing of Pretrial Motions by electronic means to the Assistant United States Attorney assigned to this case, and all others defense counsel.

s. Ubel G. Velez
Ubel G. Velez, Esquire
Attorney for Salvador Martinez-Torres

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